

Fill in this information to identify the case:

Debtor 1 Robert R. Leap

Debtor 2

United States Bankruptcy Court for the: Western District of Pennsylvania

Case number : 18-70383-JAD

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: MCLP Asset Company, Inc. as serviced by NewRez LLC d/b/a Court claim no. 5  
Shellpoint Mortgage Servicing (if known):

Last 4 digits of any number you use to identify the debtor's account: 6388

Property Address: 298 Farmers Turnpike  
Lilly, PA 15938

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 2023-08-02

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ 0.00

b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ 0.00

c. Total. Add lines a and b.

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: (c) \$ 0.00

Debtor 1 Robert R. Leap  
First Name Middle Name Last Name

Case number (if known) 18-70383-JAD

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box:*

☐ I am the creditor.

☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/S/ Joshua I. Goldman

Signature

Date 10/30/2023

Print: Joshua I. Goldman

Title Authorized Agent for Creditor

Company Padgett Law Group

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 6267 Old Water Oak Road, Suite 203

Tallahassee FL, 32312

Contact phone (850) 422-2520

Email plginquiries@padgettlawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
JOHNSTOWN**

IN RE: ROBERT R. LEAP

No: 18-70383-JAD  
CHAPTER 13

Debtor(s)

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to the parties on the attached Service List by electronic service and/or by First Class U.S. Mail on this the 30<sup>th</sup> day of October, 2023.

/S/ Joshua I. Goldman

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JOSHUA I. GOLDMAN  
PADGETT LAW GROUP  
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Tallahassee, FL 32312  
(850) 422-2520 (telephone)  
(850) 422-2567 (facsimile)  
[plginquiries@padgettlawgroup.com](mailto:plginquiries@padgettlawgroup.com)  
*Authorized Agent for Creditor*

**SERVICE LIST (CASE NO. 18-70383-JAD)**

Debtor

Robert R. Leap  
298 Farmers Turnpike  
Lilly, PA 15938

Attorney

Richard G. Allen  
Law Offices of Richard G. Allen  
P.O. Box 401  
Delmont, PA 15626

Trustee

Ronda J. Winnecour  
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600 Grant Street  
Pittsburgh, PA 15219

US Trustee

Office of the United States Trustee  
Liberty Center.  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222